

JUDGE DAVID BRIONES

FILED

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

2019 DEC -4 PM 1:22

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

BY m DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALEJANDRO CARRILLO,  
a.k.a. John Larranus, Oscar Miranda,  
and Jose Urueta,

Defendant.

No. EP-19-CR-\_\_\_\_\_

**EP 19 CR 3932**

**GOVERNMENT'S MOTION TO DETAIN DEFENDANT  
WITHOUT BOND AND MOTION FOR CONTINUANCE**

Comes now the United States of America, by and through the Deputy Assistant Attorney General for the Environment and Natural Resources Division of the U.S. Department of Justice, and pursuant to 18 U.S.C. § 3142(e) and (f), files this, its Motion to Detain Defendant Without Bond and Motion for Continuance, and for cause, would respectfully show unto the Court the following:

1. The Defendant has been charged by Indictment with a violation of Title 18, United States Code, Section 371, *Conspiracy to Smuggle and Traffic Wildlife*, as well as violations of Title 18, United States Code, Section 545, *Smuggling Wildlife into the United States*, and violations of Title 16, United States Code Sections 3372 and 3373, *Wildlife Trafficking and False Wildlife Record*.
2. The Defendant is a United States citizen, however has strong ties to Mexico and travels to Mexico frequently, and, as such, presents a high risk of fleeing to avoid prosecution on this charge.

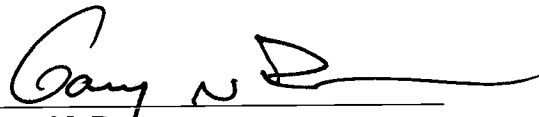
3. There are no conditions or combination of conditions which will reasonably assure the appearance of the Defendant at future court settings.

The Government would further move the Court for a three day continuance of the detention hearing from the date of the initial appearance.

WHEREFORE, premises considered, the Government respectfully prays the Court to hold the above-named Defendant without bail pending the final outcome of this case.

JEAN E. WILLIAMS  
DEPUTY ASSISTANT ATTORNEY GENERAL  
ENVIRONMENT AND NATURAL  
RESOURCES DIVISION

By:

  
\_\_\_\_\_  
Gary N. Donner  
Trial Attorney  
Environmental Crimes Section  
U.S. Department of Justice